

2023

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT CINCINNATI

IN RE: : CASE NO. 21-12000
TINA A. BAYNE : CHAPTER 13
DEBTOR : JUDGE BUCHANAN

MOTION FOR MODIFICATION OF PLAN POST CONFIRMATION AND NOTICE

The Debtor hereby moves the Court for an Order to modify the Chapter 13 Plan. Support for the motion is set forth in the following memorandum.

MEMORANDUM IN SUPPORT

1. A plan has been confirmed, and according to Form B22C, Debtor is above median income and provides at least 36 months of funding.

2. Length of Plan (months): Current: 70 Proposed: 60

3. Monthly Plan Payments: Current: \$1,760.00

Proposed: \$1,989.00 for the next 6 months (March 2023 through August 2023) and then stepping up to \$2,320.00 for the next 40 months (September 2023 through December, 2026), then stepping back down to \$2,159.00 for the final four (4) months beginning in January 2027.

4. Percent to Unsecured Creditors: Current: 10% Proposed: 10%

5. Amended schedule I and J will be filed in support of this plan modification.

6. Reason for the modification, including any changes in circumstances since last plan: This Motion is being filed to allow the case to complete within 60 months. This motion further modifies the plan to suspend any prior partial or missed chapter 13 plan payments.

WHEREFORE, Debtor moves the Court to modify Debtor's plan as set forth herein.

Respectfully submitted,

/s/ Paul J. Minnillo
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NOTICE

The Debtor has filed papers with the court to modify the plan. Your

rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy. If you do not have one, you may wish to consult one. If you do not want the court to grant the motion to modify the plan, or if you want the court to consider your views on the motion then within twenty-one (21) days from the date of service as set forth in the certificate of service below you or your attorney must file with the court a written request for a hearing {or, if the court requires a written response, an answer, explaining your position} at Clerk of the US Bankruptcy Court, Atrium Two, Suite 800, 221 East Fourth Street, Cincinnati, Ohio 45202. You must also mail a copy to Minnillo Law Group Co., LPA, 2712 Observatory Ave., Cincinnati, OH 45208; Margaret Burks, Chapter 13 Trustee, 600 Vine Street, Suite 2200, Cincinnati, OH 45202; and Office of the U.S. Trustee, J.W. Peck Federal Building, 550 Main Street, Room 4-812, Cincinnati, OH 45202. If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Modify Plan was served **electronically** on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court and by **first class mail** on March 14, 2023 addressed to:

Tina A. Bayne
424 Appaloosa Ct.
Cincinnati, OH 45231

/s/ Paul J. Minnillo
Paul J. Minnillo, Esq. (OH-0065744)